

UNITED STATES DISTRICT COURT  
DISTRICT OF RHODE ISLAND

JOHN DOE,

Plaintiff,

v.

JOHNSON & WALES UNIVERSITY,  
Defendant.

C.A. NO.: 18-106-MSM-LDA

**ASSENTED-TO MOTION OF DEFENDANT JOHNSON & WALES UNIVERSITY  
FOR AN ENLARGEMENT OF TIME TO FILE ITS REPLY MEMORANDUM**

Defendant Johnson & Wales University (“JWU”) respectfully moves for the Court’s allowance of an enlargement of time for the filing of JWU’s reply memorandum in support of its motion seeking reconsideration or, in the alternative, clarification of the Court’s Memorandum and Order entered on November 26, 2019. Currently, JWU’s reply memorandum is due on Tuesday, January 21, 2020. JWU requests an enlargement of its filing deadline to up to and including Tuesday, February 4, 2020.

JWU requires additional time to review and address the citations in Plaintiff’s opposition memorandum. Additionally, the schedules of JWU’s counsel have limited their ability to complete their drafting of the reply memorandum within the current response period.

Before filing this motion, JWU’s counsel conferred with Plaintiff’s counsel, and Plaintiff has no objection to the requested enlargement of JWU’s filing deadline to up to and including Tuesday, February 4, 2020.

JOHNSON & WALES UNIVERSITY

By its Attorneys,

Jeremy Licht  
Jeremy Licht (#9518)  
Johnson & Wales University  
8 Abbott Park Place  
Providence, RI 02903  
Tel: (401) 598-1027  
Fax: (401) 598-2240  
[jeremy.licht@jwu.edu](mailto:jeremy.licht@jwu.edu)

/s/ Steven M. Richard  
Steven M. Richard (#4403)  
Jeffrey S. Brenner (#4539)  
Nixon Peabody LLP  
One Citizens Plaza, Suite 500  
Providence, RI 02903  
Tel: (401) 454-1020  
Fax: (401) 454-1030  
[srichard@nixonpeabody.com](mailto:srichard@nixonpeabody.com)  
[jbrenner@nixonpeabody.com](mailto:jbrenner@nixonpeabody.com)

Dated: January 17, 2020

CERTIFICATE OF SERVICE

I certify that on, January 17, 2020, this assented-motion was filed and served electronically through the Court's CM/ECF system.

/s/ Steven M. Richard